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November 13, 2001

Confidential Business
Information Ranged at Pages 1 and 2

PUBLIC VERSION

VIA E-MAIL

Ms. Gloria Blue
Executive Secretary
TPSC, Office of the USTR
600 17th Street, NW
Washington, DC 20508

Re: Request for Exclusion from any Remedies Imposed Pursuant to the
Section 201 Investigation of Certain Steel Products – Stainless Steel
Medical Grade Bar

Dear Ms. Blue:

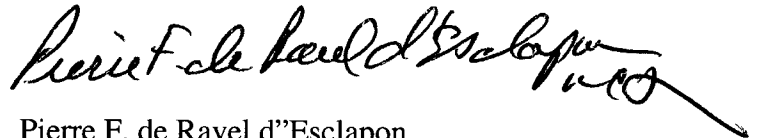
On behalf of our client, the ERAMET Group and its affiliate Forecreu America, Inc., an importer of the subject merchandise, we hereby attach Forecreu's request that certain medical grade stainless steel bar be excluded from any remedies imposed pursuant to the Section 201 steel investigation of certain steel. As set forth in the attachment, such products are not produced in the United States and any remedies imposed would most certainly injure the U.S. industries that are dependent on imports of that specific medical grade steel for use as inputs in their production process.

Confidential information contained in brackets on pages 1 and 2 has been deleted because public release of such information would disclose confidential production and sales information to the detriment of Forecreu. Confidential information has been ranged and/or summarized when possible.

Ms. Gloria Blue
November 13, 2001
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Please do not hesitate to contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

A handwritten signature in black ink, reading "Pierre F. de Ravel d'Esclapon". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Pierre F. de Ravel d'Esclapon
William C. Sjoberg

Attachment

**REQUEST FOR EXCLUSION FROM ANY REMEDIES IMPOSED PURSUANT
TO THE SECTION 201 INVESTIGATION OF CERTAIN STEEL**

STAINLESS STEEL BARS OF MEDICAL GRADE STEEL

- a. **Commercial Name:** Stainless steel bars of medical grade steel

Grades: X15TN (No AISI Std.), XD15NW, (No. AISI Std.).

HTS No.: 7222.20.0045, 7222.30.

- b. **Description:** Stainless steel bars with a round cross-section. The diameters of the bars range from 0.25 in. to 4.00 in. The length of the bars range from 10 feet to 15 feet. The X15TN is finished via centerless grinding and the X15NW is finished via rough-turning. The chemical composition of the grades are as follows (max. percent):

<u>Grade</u>	<u>Carbon</u>	<u>Chrome</u>	<u>Nickel</u>	<u>Molybdenum</u>	<u>Sulfur</u>
X15TN	[. 5	15	0	2.5	.005]
X15NW	[. 5	15	0	2.5	.005]

- c. **Basis for Requesting Exclusion:** To the best of Forecreu America's knowledge, the medical grades of stainless steel bar subject to this exclusion request are not produced in the United States. Thus, limiting imports of those grades would adversely affect U.S. industries that rely on those imports for use as raw material in the production process. In addition, X15TN and X15TNW are patented grades according to European Patent N° [] delivered on 1998 sept. 30th. As a consequence, these grades will have no equivalent material on the world market for many years.

- d. **Names and Locations of Any Producers, in the United States and foreign countries, of the Product:**

<u>Name</u>	<u>Location</u>
Aubert & Duval S.A.	France

- e. **Total U.S. Consumption of the Product by Quantity (short tons) and Value (000s) for Each Year 1996 to 2000 and Projected Annual Consumption for Each Year from 2001 to 2005:**

	1996	1997	1998	1999	2000
QTY.	[1.5]	1.5	1.5	.5	.5]
VAL.	[14]	14	14	4.5	17.5]

	2001	2002	2003	2004	2005
QTY.	[.5]	.5	.4	.4	.25]
VAL.	[17.5]	17.5	7.5	7.5	5]

Basis for the projections: Market analysis and knowledge of the industry.

- f. **Total U.S. Production of the Product for Each Year from 1996 to 2000:**

	1996	1997	1998	1999	2000
QTY.	0.00	0.00	0.00	0.00	0.00
VAL.	0.00	0.00	0.00	0.00	0.00

- g. **The Identity of Any U.S.-Produced Substitute for the Product, Total U.S. Production of the Substitute for Each Year 1996 to 2000 and the Names of any U.S. Producers of the Substitute:** There is no U.S.-produced substitute for the grades of stainless steel bar subject to this exclusion request.